IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

TALIA HARRISON,

Plaintiff,

VS.

Civil Action No. 4:21-cv-607-ALM

TYLER TECHNOLOGIES, INC.,

Defendant

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND FOR DEFENDANT'S REPLY THERETO

Pursuant to this Court's Order of August 30, 2022 (ECF No. 26), the deadline for Plaintiff to submit a Response to the Defendant's Motion for Summary Judgment is September 5, 2022. Plaintiff's counsel previously requested a brief extension through this date but was unaware at the time that Plaintiff would be traveling over the holiday weekend and unable to consult on aspects of the briefing and evidence.

Plaintiff respectfully requests that the deadline for submitting a response to Defendant's Motion for Summary Judgement be briefly extended for two days, through and including September 7, 2022. Defendant is not opposed to this extension, so long as the Court will also extend Defendant's deadline to file its Reply by two days through and including September 21, 2022. This extension is sought in good faith, before the deadlines have passed, and is not filed for purposes of delay. No further extensions will be requested.

Respectfully submitted,

SHELLIST LAZARZ SLOBIN LLP

11 Greenway Plaza Suite 1515 Houston, Texas 77046 <u>s/ Melinda Arbuckle</u>Melinda ArbuckleTexas Bar No. 24080773

Tel: 713.621.2277 Fax: 713.621.0993

marbuckle@wageandhourfirm.com

DELONG CALDWELL BRIDGERS FITZPATRICK & BENJAMIN, LLC

101 Marietta Street Suite 2650 Atlanta, GA 30303 (404) 979-3150 (404) 979-3170 (facsimile) matthew.herrington@dcbflegal.com s/ Matthew W. Herrington Matthew W. Herrington Georgia Bar No. 275411

Counsel for Plaintiffs

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendant regarding the relief requested in this Motion on September 5, 2022 via email, and Defendant is unopposed to this Motion.

<u>s/Melinda Arbuckle</u>Melinda Arbuckle

CERTIFICATE OF SERVICE

On August 26, 2022, I filed the foregoing document with the Clerk of Court for the Eastern District of Texas using CM/ECF method of the Court. I certify that I have served all counsel of record electronically thereby.

<u>s/Melinda Arbuckle</u> Melinda Arbuckle